

United States District Court
Southern District of Texas
Houston Division

United States Courts
Southern District of Texas
FDI FD

SEP 07 2011

United States

v.

Vance Valentine and

Sheila Valentine

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)

)

Crim. No.

H 11 - 636

Indictment

The Grand Jury Charges that:

COUNT ONE
(Conspiracy)

Introduction

At all times material to this indictment:

1. The United Transportation Union Local 524 (Local 524) was a Labor Organization as defined by the Labor Management Reporting and Disclosure Act.

2. Local 524 represented approximately 150 members employed in the railroad industry as locomotive conductors, signalmen, and brakemen.

3. Local 524 received most of its income via monthly dues payments from its members.

4. Local 524's officer positions were President, Secretary Treasurer, Local Chairman, and Trustee.

Members of the conspiracy

5. Defendant Vance Valentine was Local 524's Secretary Treasurer.

6. Defendant Sheila Valentine wrote Local 524 checks and maintained Local 524 records.

The conspiracy and its objects

7. From in or about August 2005 until in or about December 2008, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants,

VANCE VALENTINE

and

SHEILA VALENTINE,

did knowingly combine, confederate, conspire and agree with each other and with other persons both known and unknown to the Grand Jury to embezzle, steal and unlawfully and willfully abstract and convert to their own use and the use of another the moneys, funds, securities,

property, and other assets of Local 524 in violation of Title 29, United States Code, Section 501(c).

The manner and means of the conspiracy

8. It was part of the conspiracy that Vance Valentine and Sheila Valentine would and did write unauthorized Local 524 checks to themselves, make unauthorized debit card purchases with Local 524's debit card, and make unauthorized cash withdrawals from Local 524's account.

9. It was further part of the conspiracy that Vance Valentine and Sheila Valentine would and did forge and cause to be forged business records to cover up these unauthorized charges, including check stubs and journal entries.

Overt acts

10. In furtherance of the conspiracy and to effect the objects thereof, the defendants performed and caused to be performed, among others, the overt acts set forth in Counts Two – Five of this Indictment, hereby re-alleged and incorporated as if fully set forth in this Count of the Indictment.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO-FIVE
(Embezzlement of Union Funds)

11. From in or about August 2005 to in or about January 2009, in the Houston Division of the Southern District of Texas and elsewhere, Defendant,

VANCE VALENTINE,

while employed, directly and indirectly, by Local 524 of the United Transportation Union, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to his own use and the use of another the moneys, funds, securities, property, and other assets of said labor organization in the following approximate amounts:

Count No.	Date	Method of Payment	Amount
2	29 November 2006	Check No. 1183	\$2,059.10
3	15 June 2007	Check No. 1287	\$1,405.38
4	17 February 2008	Check No. 1363	\$1,287.13
5	16 October 2008	Check No. 1456	\$1,000.00

In violation of Title 29, United States Code, Section 501(c) and 18,
United States Code, Section 2.

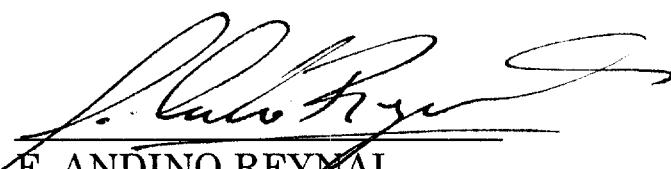
A TRUE BILL

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

JOSE ANGEL MORENO
UNITED STATES ATTORNEY

BY:


F. ANDINO REYNAL
ASSISTANT U.S. ATTORNEY